

Federal Operating Permit Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Huber Engineered Woods, LLC
Mailing Address:	Route 3, Highway 626 Crystal Hill, VA 24539
Facility Name:	Huber Engineered Woods, LLC - Crystal Hill, VA
Registration Number:	30905
Facility Location:	Chaney Lane - Route 3, Highway 626, Halifax County, Virginia

Permit Number VA-30905

May 22, 2003
Effective Date

<u>January 22, 2004</u>	<u>November 10, 2004</u>
Minor Modification and Administrative Amendment Date	Significant Modification Date

May 21, 2008
Expiration Date

Robert G. Burnley
Director, Department of Environmental Quality

November 10, 2004
Signature Date

Table of Contents, 3 pages
Permit Conditions, 48 pages
Attachment: Consent Order dated 9/17/04

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I. Facility Information

Permittee

Huber Engineered Woods, LLC
Highway 626, Route 3
P.O. Box 38
Crystal Hill, VA 24539

Responsible Official

Rich Holtman
Plant Manager

Facility

Huber Engineered Woods, LLC - Crystal Hill, VA
Chaney Lane - Highway 626, Route 3,
Halifax County

Contact Person

George Hodges
Environmental Coordinator
(434) 476-6628

AFS Identification Number: 51-083-00050

Facility Description: SIC Code 2493 – The facility manufactures a reconstituted wood product known as oriented strandboard (OSB).

Emission Units

Equipment to be operated consists of:

A. Significant Emissions Units

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity* (Notes 1 & 2)	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Apj
WY	S4	Wood yard (PS&E Log Handling line) & (2) Waferizers	84,291 OD lbs/hr output & 71,902 OD lbs/hr output, combined	---	---	PM	
ES&D	S1A & S1B	Wellons Energy System including a 40 MMBtu/hr Wood Fired Thermal Oil Heat Exchanger & (4) MEC 1360 TNF/G triple pass rotary dryers	240 MMBtu/hr & 104,000 OD lb/hr output	For each stack, (2) parallel Geoenergy WESPs in series with (1) Smith Engineering RTO	DC1A, DC1B, RTO-1, & DC1C, DC1D, RTO -2	Products of Wood Combustion plus Additional PM and VOC from Process	
GB	S6	Natural Gas Fired Backup Thermal Oil Heater	40 MMBtu/hr	---	---	Products of Natural Gas Combustion	
BF	S2	Blending & PS&E Forming line	63,541 OD lb/hr output	MAC 144MCF572 fabric filter	DC2B	PM	
P	S5	Siempelkamp 8' x 24' x 14 opening Press	120,000 OD lb/hr output	Durr Environmental 5-can RTO	RTO -3	PM & VOC	
FSS	S3	Finish Sawing & Sanding (Globe Finishing line)	175 ft/min @ 8 ft wide & 0.008 ft depth	MAC 144MCF494 fabric filter	DC3C	PM	
DC4C	S4	Unresinated Dust Handling System	71,000 acfm	MAC 144MCF572 fabric filter	DC4C	PM	

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity ¹ (Notes 1 & 2)	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Appl
SA2	S7	Six Head Sander	175 ft/min	MAC 144MCF572 fabric filter	DC5	PM	am
IA	IA	Brand Name Logo and Nail Mark Application System	Thirty (30) 4' x 8' panels per minute	---	---	VOC	M am
T2(a-d)	---	(4) Liquid Resin Storage Tanks	10,000 gal, each	---	---	VOC	
T1a, T1b	---	(2) Wax tanks	25,500 gal, each	---	---	---	
T3	---	Thermal Oil tank	12,000 gal	---	---	---	
T4	---	Hydraulic Oil 68 tank	15,900 gal	---	---	---	

Notes:

1. The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.
2. OD = Oven Dry
3. Permit date: November 10, 2004

II. Process Equipment Requirements – (emission unit WY ~ Wood Yard)

A. Limitations for the Wood Yard (WY)

1. Particulate emissions from open storage of wood materials shall be controlled by wet suppression.
(9 VAC 5-80-110 and Condition 8 of November 10, 2004 Permit)
2. Visible emissions from the wood yard (WY) operations shall not exceed ten percent (10%) opacity. "Wood yard operations" are defined as sawing, debarking, and material handling of wood feed stock and storage of energy system fuels.
(9 VAC 5-80-110 and Condition 34 of November 10, 2004 Permit)

B. Monitoring for the Wood Yard (WY)

1. At least one time per calendar week an observation of the presence of visible emissions from the wood yard (WY) operation shall be made. The presence of visible emissions shall require the permittee to:
 - a. take timely corrective action such that the wood yard operation resumes operation with no visible emissions, or,
 - b. conduct a visible emission evaluation (VEE), in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the affected area are 10 percent opacity or less. Timely corrective action shall be taken, if necessary, such that the equipment resumes operation within the 10 percent opacity limit.
 - c. If visible emission inspections conducted during four (4) consecutive weeks show no visible emissions the permittee may reduce the monitoring frequency to once per month for that emission unit. Anytime the monthly visible emissions inspections show visible emissions, or when requested by DEQ, the monitoring frequency shall be increased to once per week.

The permittee shall maintain an observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the name of the observer. If the wood yard (WY) as defined in Condition II.A.2 has not been operated during the week, it shall be noted in the log book that the equipment was not operated and that a visual observation was not required.

(9 VAC 5-80-110 E and 9 VAC 5-80-110 K)

C. Recordkeeping for the Wood Yard

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:
 - a. The origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations.
 - b. Results of weekly or monthly opacity observations of the wood yard operation (WY), along with details regarding any necessary corrective actions.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
(9 VAC 5-80-110)

III. Process Equipment Requirements – (emission unit ES & D ~ Energy System and Dryers)

A. Limitations for the Energy System and Dryers (ES & D)

1. Particulate, VOC and carbon monoxide emissions from the wood-fired energy system (ES), and the flake dryers (D) shall be controlled by four (4) Wet Electrostatic Precipitators (DC1A, DC1B, DC1C, DC1D) followed by two (2) Regenerative Thermal Oxidizers (RTOs #1 and #2). [For the purposes of this permit, the "primary control systems" are defined as two \(2\) WESPs connected in parallel to a single RTO.](#) The control efficiency of the WESP/RTO combination for VOC shall be a minimum of 96.0 percent. Each WESP (DC1A, DC1B, DC1C, DC1D) and each RTO (RTOs #1 and #2) shall be provided with adequate access for inspection.
(9 VAC 5-80-110 and Condition 3 of November 10, 2004 Permit)

2. The minimum combustion chamber temperature for RTO #1 shall be maintained at 1500 °F when any dryer is processing flakes. The exhaust gas shall have a minimum of a one and one half (1.5) second retention time in the combustion chamber.

The minimum combustion chamber temperature for RTO #2 shall be maintained at 1500 °F when any dryer is processing flakes. The exhaust gas shall have a minimum of a one and one half (1.5) second retention time in the combustion chamber.

(9 VAC 5-80-110 and Condition 5 of November 10, 2004 Permit)

3. The approved fuels for the wood-fired energy system (ES) are on-site generated wood, purchased wood and on-site generated wastes. "On-site generated wood" is defined as wood feed stock, bark, resinated and unresinated saw and sander dusts, and other wood wastes capable of being hogged. This definition does not include wood

contaminated with paints, plastics, finishing material or chemical treatments.

"Purchased wood" is defined as clean wood and wood wastes which do not contain chemical treatments nor have affixed thereto paint and/or finishing materials or paper or plastic laminates or other foreign materials which might emit toxic air pollutants when burned. "On-site generated wastes" are defined as waste edge sealant from the clean up of the paint booths, wax from spillage and clean up, resin spillage, paper products, WESP blowdown, and hydraulic and hot oil wastes. "Waste edge sealant" shall not include spray booth filters. "Paper products" are defined as cardboard and office paper. A change in the fuels may require a permit to modify and operate. (9 VAC 5-80-110 and Condition 9 of November 10, 2004 Permit)

4. The wood-fired energy system (ES) shall consume no more than 233,600 tons per year of wood, 12 tons per year of waste edge seal, 5 tons per year of wax spillage, 25 tons per year of resin spillage, 365 tons per year of paper products, 1.94×10^6 gallons per year of WESP blowdown, and 5,000 gallons per year of hydraulic and hot oil wastes, each calculated monthly as the sum of each consecutive twelve (12) month period.
(9 VAC 5-80-110 and Condition 12 of November 10, 2004 Permit)
5. The annual throughput of the oven dried flakes through the four dryers combined shall not exceed 455,520 tons per year, calculated monthly as the sum of each consecutive twelve (12) month period.
(9 VAC 5-80-110 and Condition 15 of November 10, 2004 Permit)
6. Except where this permit is more restrictive than the applicable requirement, the wood fired energy system and the backup thermal oil heater shall be operated in compliance with the requirements of 40 CFR 60, Subpart Dc.
(9 VAC 5-80-110 and Condition 13 of November 10, 2004 Permit)
7. Visible emissions from each primary control system, as defined in Condition III.A.1, shall not exceed 10 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-80-110 and Condition 35 of November 10, 2004 Permit)
8. Emissions from the operation of the wood-fired energy system, the flake dryers, and the primary control systems shall not exceed the limits specified below:

	<u>lbs/10⁶ Btu</u>	<u>lbs/hr</u>	<u>tons/yr</u>
Particulate Matter (Includes condensable PM)	0.04 (40 CFR 60 Subpart Dc)	---	40.1
PM-10 (Includes condensable PM)	0.04	---	40.1
Sulfur Dioxide	---	5.33	23.4

Nitrogen Oxides (as NO ₂)	---	32.75	143.5
Carbon Monoxide	---	31.90	139.7
Volatile Organic Compounds	---	13.70	60.0

(9 VAC 5-80-110, 40 CFR 60 Subpart Dc, and Condition 31 of November 10, 2004 Permit)

9. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - b. Maintain an inventory of spare parts.
 - c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
 - d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-80-110 and Condition 44 of November 10, 2004 Permit)

10. See section XIII of this permit for additional limitations for the Energy System and Dryers.
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

B. Monitoring for the Energy System and Dryers (ES & D)

1. Each WESP shall be equipped with a device for the continuous measurement and recording of secondary current (direct current amperes) and secondary voltage (direct current volts) (by field) across the ESP.
(9 VAC 5-80-110 and Condition 3 of November 10, 2004 Permit)
2. Each RTO shall be equipped with a device for the continuous measurement and recording of the temperature in the combustion chamber.
(9 VAC 5-80-110 and Condition 3 of November 10, 2004 Permit)

3. Continuous emission monitors shall be installed on the outlet for each primary control system (S1A and S1B) to measure and record opacity. The continuous emissions monitoring systems shall conform to the design specifications stipulated in 40 CFR 60, Appendix B, Performance Specification 1. The monitoring systems shall be installed, maintained, evaluated, calibrated and operated in accordance with 40 CFR 60.13, 40 CFR 60 Subpart Dc and 40 CFR 60, Appendix B. During all periods of facility operation, the monitoring systems shall be in continuous operation except for system breakdowns, repairs, calibration checks, and zero and span adjustments.

After the initial performance evaluation, the permittee shall conduct opacity monitoring system audits, on a regularly scheduled basis, to demonstrate compliance with the calibration error specification (40 CFR 60, Appendix B, Performance Specification 1). In no case shall the length of time between audits exceed twelve months. A 30-day notification prior to each scheduled audit shall be submitted to the South Central Regional Office.

The permittee shall submit a report of monitored excess emissions and monitor performance semiannually. The reports are to be submitted, postmarked no later than 30 calendar days after the end of each semiannual period to the South Central Regional Office
(9 VAC 5-80-110 and Condition 26 of November 10, 2004 Permit)

4. A Parameter Monitoring Systems (PMS), meeting the design specifications of 40 CFR Part 60, Appendix B, shall be installed to measure and record the emissions of carbon monoxide from each primary control system in ppmvd corrected to 16% O₂. See Condition III.A.1 for definition of the primary control systems. Except where otherwise indicated in this permit, each PMS shall be installed, calibrated, maintained, audited and operated in accordance with the requirements of 40 CFR 60.13, and Appendices B and F or DEQ approved procedures which are equivalent to the requirements of 40 CFR 60.13 and Appendices B and F. Data shall be reduced to one hour averages.
(9 VAC 5-80-110 and Condition 27 of November 10, 2004 Permit)
5. Performance evaluations of each parameter monitoring systems shall be conducted in accordance with 40 CFR Part 60, Appendix B, and shall take place within 180 days of the date of the New Source Performance Standards permit dated November 10, 2004. Two copies of the performance evaluations report shall be submitted to the South Central Regional Office within 45 days of the evaluation. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation and calibration of the device. A 30 day notification prior to the demonstration of each parameter monitoring system's performance evaluation shall be submitted to the South Central Regional Office.
(9 VAC 5-80-110 and Condition 29 of November 10, 2004 Permit)
6. A PMS quality control program which is equivalent to the requirements of 40 CFR 60.13 and Appendix F shall be implemented for each parameter monitoring systems

except that Relative Accuracy Test Audits (RATA's) may be required less frequently if approved by DEQ.

(9 VAC 5-80-110 and Condition 30 of November 10, 2004 Permit)

7. See section XIII of this permit for additional monitoring requirements for the Energy System and Dryers.

(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

C. Recordkeeping for the Energy System and Dryers (ES & D)

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:
 - a. The daily and yearly consumption by the wood-fired energy system of wood, waste edge sealant, wax spillage, resin spillage, paper products, each in units of tons, and the daily and yearly consumption of WESP blowdown, and hydraulic and hot oil wastes, each in units of gallons. Each of these yearly consumption rates shall be calculated monthly as the sum of each consecutive twelve (12) month period.
 - b. The yearly throughput of the flake dryers, in units of oven dried tons per year, calculated monthly as the sum of each consecutive twelve (12) month period.
 - c. Records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the energy system; any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.
 - d. The origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations.
 - e. Copies of secondary current and voltage monitoring records for each WESP.
 - f. Copies of combustion chamber temperature monitoring records for each RTO.
 - g. Copies of semiannual excess emission reports required in Condition III.B.3.
 - h. Copy of stack test results required in Condition III.E.1.
 - i. For the primary control systems:
 - (1) The magnitude of carbon monoxide emissions, any conversion factors used in the calculation of carbon monoxide emissions, including the date and time of measurement;

- (2) Specific identification of each period of carbon monoxide emissions that occurs during startups, shutdowns, and malfunctions of the process, the nature and cause of the malfunction (if known), the corrective action taken or preventative measures adopted; and
- (3) The date and time identifying each period during which the parameter monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments;

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110 and Condition 39.a, 39.b, 39.h, and 39.i of November 10, 2004 Permit)

2. See section XIII of this permit for additional recordkeeping requirements for the Energy System and Dryers.
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

D. Reporting for the Energy System and Dryers (ES & D)

1. Except as required by Conditions III.B.3 and III.D.2, there are no unit specific applicable requirements for reporting for this emission unit.
2. See section XIII of this permit for additional reporting requirements for the Energy System and Dryers.
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

E. Testing for the Energy System and Dryers (ES & D)

1. At a frequency not to exceed once every five years, the permittee shall conduct a stack test at stacks (S1A and S1B) to demonstrate compliance with the pound per hour and grains per dry standard cubic foot emission limits contained in Condition III.A.8 of this permit. The initial test shall be performed within 180 days after the effective date of this permit. The test shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30. The details of the tests shall be arranged with the South Central Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. Two copies of the test results shall be submitted to the South Central Regional Office within 60 days after test completion and shall conform to the test report format enclosed with this permit.
(9 VAC 5-80-110 and 9 VAC 5-50-30)
2. See section XIII of this permit for additional testing requirements for the Energy System and Dryers.
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

IV. Process Equipment Requirements – (emission unit GB ~ 40 MMBtu/hr Backup Thermal Oil Heater)

A. Limitations for the Backup Thermal Oil Heater (GB)

1. The approved fuels for the backup thermal oil heater are natural gas and propane. A change in the fuel may require a permit to modify and operate.
(9 VAC 5-80-110 and Condition 10 of November 10, 2004 Permit)

B. Monitoring for the Backup Thermal Oil Heater (GB)

1. At least one time per calendar week an observation of the presence of visible emissions from the backup thermal oil heater stack (S6) shall be made. The presence of visible emissions shall require the permittee to:
 - a. take timely corrective action such that the back up thermal oil heater stack (S6) resumes operation with no visible emissions, or,
 - b. conduct a visible emission evaluation (VEE) on the back up thermal oil heater stack (S6), in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the affected stack are 20 percent opacity or less. If any of the observations exceed the opacity limitation of 20 percent, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the fuel burning equipment resumes operation within the 20 percent opacity limit.
 - c. If visible emission inspections conducted during four (4) consecutive weeks show no visible emissions the permittee may reduce the monitoring frequency to once per month for that stack. Anytime the monthly visible emissions inspections show visible emissions, or when requested by DEQ, the monitoring frequency shall be increased to once per week.

The permittee shall maintain a stack observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the name of the observer. If the fuel burning equipment has not been operated during the week, it shall be noted in the log book that the equipment was not operated and that a visual observation was not required.
(9 VAC 5-80-110 E and 9 VAC 5-80-110 K)

C. Recordkeeping for the Backup Thermal Oil Heater (GB)

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:

- a. The permittee shall maintain records of the daily and yearly consumption by the Energy System's backup thermal oil heater of natural gas in units of cubic feet, and propane in units of gallons. Each yearly consumption rate shall be calculated monthly as the sum of each consecutive twelve (12) month period.
(9 VAC 5-80-110 and Condition 39.j of November 10, 2004 Permit)
- b. The origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations.
- c. Results of weekly or monthly opacity observations of the backup thermal oil heater (GB), along with details regarding any necessary corrective actions.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
(9 VAC 5-80-110)

V. Process Equipment Requirements – (emission unit BF ~ Blending and Forming)

A. Limitations for Blending and Forming (BF)

1. Particulate emissions from the resinated dust handling system shall be controlled by a fabric filter (DC2B).
(9 VAC 5-80-110 and Condition 7 of November 10, 2004 Permit)
2. The annual throughput of the powdered resin shall not exceed 10,442 tons per year, calculated monthly as the sum of each consecutive twelve (12) month period.
(9 VAC 5-80-110 and Condition 17 of November 10, 2004 Permit)
3. Visible emissions from the resinated dust handling system's fabric filter (DC2B) shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-80-110 and Condition 36 of November 10, 2004 Permit)
4. Emissions from the operation of the resinated dust handling system (DC2B) shall not exceed the limits specified below:

Particulate Matter	0.01 gr/dscf	16.10 tons/yr
PM-10	0.01 gr/dscf	16.10 tons/yr

(9 VAC 5-80-110, and Condition 33 of November 10, 2004 Permit)

5. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - b. Maintain an inventory of spare parts.
 - c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
 - d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-80-110 and Condition 44 of November 10, 2004 Permit)

B. Monitoring for Blending and Forming (BF)

1. The fabric filter (DC2B) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.
(9 VAC 5-80-110 and Condition 7 of November 10, 2004 Permit)
2. At least one time per calendar week an observation of the presence of visible emissions from the blending and forming operation fabric filter stack (S2) shall be made. The presence of visible emissions shall require the permittee to:
 - a. take timely corrective action such that the blending and forming operation fabric filter stack (S2) resumes operation with no visible emissions, or,
 - b. conduct a visible emission evaluation (VEE) on the blending and forming operation fabric filter stack (S2), in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the blending and forming operation fabric filter stack (S2) are 5 percent opacity or less. If any of the observations exceed the opacity limitation of 5 percent, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the equipment resumes operation within the 5 percent opacity limit.
 - c. If visible emission inspections conducted during four (4) consecutive weeks show no visible emissions the permittee may reduce the monitoring frequency to once

per month for that stack. Anytime the monthly visible emissions inspections show visible emissions, or when requested by DEQ, the monitoring frequency shall be increased to once per week.

The permittee shall maintain an observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the name of the observer. If the blending and forming operation has not been operated during the week, it shall be noted in the log book that the equipment was not operated and that a visual observation was not required.

(9 VAC 5-80-110 E and 9 VAC 5-80-110 K)

C. Recordkeeping for Blending and Forming (BF)

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:
 - a. The yearly throughput of powdered resin, in units of tons per year, calculated monthly as the sum of each consecutive twelve (12) month period.
 - b. The origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations.
 - c. Results of weekly or monthly opacity observations of the blending and forming operation (BF), along with details regarding any necessary corrective actions.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110 and Condition 39.d of November 10, 2004 Permit)

VI. Process Equipment Requirements – (emission unit P ~ Press)

A. Limitations for the Press (P)

1. Emissions from the press (P) shall be captured by maintaining a negative pressure within the press enclosure room. The negative pressure shall be maintained by work practices, including but not limited to, the closing of man doors, hatchways, bay doors, and other similar openings used for access purposes, at all times during operation of the press, except during short periods when the opening is being used for its intended purpose, such as personnel ingress/egress from the building. Particulate and VOC emissions from the press shall be controlled by a Regenerative Thermal Oxidizer (RTO #3). The RTO #3 shall be provided with adequate access for inspection.

(9 VAC 5-80-110 and Condition 4 of November 10, 2004 Permit)

2. The minimum combustion chamber temperature for the RTO #3 shall be maintained at 1500 °F when the press is processing panels. The exhaust gas from the press shall have a minimum one (1) second retention time in the combustion chamber.
(9 VAC 5-80-110 and Condition 6 of November 10, 2004 Permit)
3. The annual throughput of the oven dried flakes through the press shall not exceed 525,600 tons per year, calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-110 and Condition 16 of November 10, 2004 Permit)
4. Visible emissions from RTO #3 shall not exceed 10 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-80-110 and Condition 35 of November 10, 2004 Permit)
5. Emissions from the operation of the press (P) shall not exceed the limits specified below:

	<u>lbs/hr</u>	<u>tons/yr</u>
Particulate Matter (includes condensable PM)	3.97	17.4
PM-10 (includes condensable PM)	3.97	17.4
Nitrogen Oxides (as NO ₂)	3.89	17.0
Carbon Monoxide	0.32	1.4
Volatile Organic Compounds	0.86	3.8

(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 32 of November 10, 2004 Permit)

6. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - b. Maintain an inventory of spare parts.
 - c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.

- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-80-110 and Condition 44 of November 10, 2004 Permit)

7. See section XIII of this permit for additional limitations for the Press.
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

B. Monitoring for the Press (P)

1. The RTO #3 shall be equipped with a device for the continuous measurement and recording of the temperature in the combustion chamber.
(9 VAC 5-80-110 and Condition 4 of November 10, 2004 Permit)
2. At least one time per calendar week an observation of the presence of visible emissions from the press stack (S5) shall be made. The presence of visible emissions shall require the permittee to:
 - a. take timely corrective action such that the press stack (S5) resumes operation with no visible emissions, or,
 - b. conduct a visible emission evaluation (VEE) on the press stack (S5), in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the affected stack are 10 percent opacity or less. If any of the observations exceed the opacity limitation of 10 percent, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the equipment resumes operation within the 10 percent opacity limit.
 - c. If visible emission inspections conducted during four (4) consecutive weeks show no visible emissions the permittee may reduce the monitoring frequency to once per month for that stack. Anytime the monthly visible emissions inspections show visible emissions, or when requested by DEQ, the monitoring frequency shall be increased to once per week.

The permittee shall maintain a stack observation log for the press stack (S5) to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the name of the observer. If the press has not been operated during the week, it shall be noted in the log book that the equipment was not operated and that a visual observation was not required.
(9 VAC 5-80-110 E and 9 VAC 5-80-110 K)

3. See section XIII of this permit for additional monitoring requirements for the Press.
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

C. Recordkeeping for the Press (P)

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:
 - a. The yearly throughput of the press, in units of oven dried tons per year, calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-110 and Condition 39.c of November 10, 2004 Permit)
 - b. Copies of combustion chamber temperature monitoring records for the RTO.
 - c. The origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations.
 - d. Results of weekly or monthly opacity observations of the press (P), along with details regarding any necessary corrective actions.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110)

2. See section XIII of this permit for additional recordkeeping requirements for the Press.
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

D. Reporting for the Press (P)

See section XIII of this permit for reporting requirements for the Press.
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

E. Testing for the Press (P)

See section XIII of this permit for testing requirements for the Press.
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

VII. Process Equipment Requirements – (emission unit FSS ~ Finish Sawing and Sanding)

A. Limitations for Finish Sawing and Sanding (FSS)

1. Particulate emissions from the sander and saw dust handling systems (FSS) shall be controlled by a fabric filter (DC3C).
(9 VAC 5-80-110 and Condition 7 of November 10, 2004 Permit)
2. Visible emissions from the sander and saw dust handling system's fabric filter (DC3C) shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-80-110 and Condition 36 of November 10, 2004 Permit)

3. Emissions from the operation of the sander and saw dust handling system (DC3C) shall not exceed the limits specified below:

Particulate Matter	0.01 gr/dscf	19.60 tons/yr
PM-10	0.01 gr/dscf	19.60 tons/yr

(9 VAC 5-80-110, and Condition 33 of November 10, 2004 Permit)

4. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - b. Maintain an inventory of spare parts.
 - c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
 - d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-80-110 and Condition 44 of November 10, 2004 Permit)

B. Monitoring for Finish Sawing and Sanding (FSS)

1. The fabric filter (DC3C) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.
(9 VAC 5-80-110 and Condition 7 of November 10, 2004 Permit)

2. At least one time per calendar week an observation of the presence of visible emissions from the finish sawing and sanding operation fabric filter stack (S3) shall be made. The presence of visible emissions shall require the permittee to:
 - a. take timely corrective action such that the finish sawing and sanding operation fabric filter stack (S3) resumes operation with no visible emissions, or,
 - b. conduct a visible emission evaluation (VEE), in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the finish sawing and sanding operation fabric filter stack (S3) are 5 percent opacity or less. If any of the observations exceed the opacity limitation of 5 percent, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the equipment resumes operation within the 5 percent opacity limit.
 - c. If visible emission inspections conducted during four (4) consecutive weeks show no visible emissions the permittee may reduce the monitoring frequency to once per month for that stack. Anytime the monthly visible emissions inspections show visible emissions, or when requested by DEQ, the monitoring frequency shall be increased to once per week.

The permittee shall maintain an observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the name of the observer. If the finish sanding and sawing equipment has not been operated during the week, it shall be noted in the log book that the equipment was not operated and that a visual observation was not required.

(9 VAC 5-80-110 E and 9 VAC 5-80-110 K)

C. Recordkeeping for Finish Sawing and Sanding (FSS)

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:
 - a. The origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations.
 - b. Results of weekly or monthly opacity observations of the finish sawing and sanding operation (FSS), along with details regarding any necessary corrective actions.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110)

VIII. Process Equipment Requirements – (emission unit DC4C ~ Unresinated Dust Handling System)

A. Limitations for Unresinated Dust Handling System (DC4C)

1. Particulate emissions from the unresinated dust handling system (DC4C) shall be controlled by a fabric filter (DC4C).
(9 VAC 5-80-110 and Condition 7 of November 10, 2004 Permit)
2. Visible emissions from the unresinated dust handling system's fabric filter (DC4C) shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-80-110 and Condition 36 of November 10, 2004 Permit)
3. Emissions from the operation of the unresinated dust handling system (DC4C) shall not exceed the limits specified below:

Particulate Matter	0.01 gr/dscf	24.85 tons/yr
PM-10	0.01 gr/dscf	24.85 tons/yr

(9 VAC 5-80-110, and Condition 33 of November 10, 2004 Permit)

4. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - b. Maintain an inventory of spare parts.
 - c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
 - d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-80-110 and Condition 44 of November 10, 2004 Permit)

B. Monitoring for the Unresinated Dust Handling System (DC4C)

1. The fabric filter (DC4C) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.
(9 VAC 5-80-110 and Condition 7 of November 10, 2004 Permit)
2. At least one time per calendar week an observation of the presence of visible emissions from the unresinated dust handling system stack (S4) shall be made. The presence of visible emissions shall require the permittee to:
 - a. take timely corrective action such that the unresinated dust handling system (DC4C) resumes operation with no visible emissions, or,
 - b. conduct a visible emission evaluation (VEE) on the unresinated dust handling system stack (S4) in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the unresinated dust handling system are 5 percent opacity or less. If any of the observations exceed the opacity limitation of 5 percent, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the unresinated dust handling system resumes operation within the 5 percent opacity limit.
 - c. If visible emission inspections conducted during four (4) consecutive weeks show no visible emissions the permittee may reduce the monitoring frequency to once per month for that stack. Anytime the monthly visible emissions inspections show visible emissions, or when requested by DEQ, the monitoring frequency shall be increased to once per week.

The permittee shall maintain an unresinated dust handling system stack observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the name of the observer. If the unresinated dust handling system has not been operated during the week, it shall be noted in the log book that the equipment was not operated and that a visual observation was not required.

(9 VAC 5-80-110 E and 9 VAC 5-80-110 K)

C. Recordkeeping for the Unresinated Dust Handling System (DC4C)

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:

- a. The origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations.
- b. Results of weekly or monthly opacity observations of the unresinated dust handling system (DC4C), along with details regarding any necessary corrective actions.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
(9 VAC 5-80-110)

IX. Process Equipment Requirements – (emission unit SA2 ~ Six Head Sander)

A. Limitations for Six Head Sander (SA2)

1. Particulate emissions from the six head sander (SA2) shall be controlled by a fabric filter (DC5). The fabric filter shall be provided with adequate access for inspection and shall be in operation when the six head sander is operating.
(9 VAC 5-80-110 and Condition 3 of 1/23/02 permit, as amended 1/22/04)
2. The throughput of Oriented Strandboard shall not exceed $522 \times 10^6 \text{ ft}^2$ per year, calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-110 and Condition 6 of 1/23/02 permit, as amended 1/22/04)
3. Emissions from the operation of the six head sander (SA2) shall not exceed the limits specified below:

Particulate Matter	0.01 gr/dscf	17.4 tons/yr
PM-10	0.01 gr/dscf	14.8 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with the annual emission limits may be determined as stated in Condition IX.A.2.
(9 VAC 5-80-110, and Condition 7 of 1/23/02 permit, as amended 1/22/04)

4. Visible emissions from the six head sander fabric filter (DC5) shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-80-110, and Condition 8 of 1/23/02 permit, as amended 1/22/04)
5. Visible emissions from the six head sander material handling, load-out, and storage shall not exceed 10 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-80-110, and Condition 9 of 1/23/02 permit, as amended 1/22/04)

B. Monitoring for Six Head Sander (SA2)

1. The fabric filter (DC5) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The monitoring device shall be installed, maintained, calibrated, and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. The monitoring device shall be provided with adequate access for inspection and shall be in operation when the fabric filter is operating.
(9 VAC 5-80-110, and Condition 5 of 1/23/02 permit, as amended 1/22/04)
2. At least one time per calendar week an observation of the presence of visible emissions from the six head sander fabric filter stack (S7) shall be made. The presence of visible emissions shall require the permittee to:
 - a. take timely corrective action such that six head sander fabric filter stack (S7) resumes operation with no visible emissions, or,
 - b. conduct a visible emission evaluation (VEE), in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the six head sander fabric filter stack (S7) are 5 percent opacity or less. If any of the observations exceed the opacity limitation of 5 percent, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the equipment resumes operation within the 5 percent opacity limit.
 - c. If visible emission inspections conducted during four (4) consecutive weeks show no visible emissions the permittee may reduce the monitoring frequency to once per month for that stack. Anytime the monthly visible emissions inspections show visible emissions, or when requested by DEQ, the monitoring frequency shall be increased to once per week.

The permittee shall maintain an observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the name of the observer. If the six head sander has not been operated during the week, it shall be noted in the log book that the equipment was not operated and that a visual observation was not required.

(9 VAC 5-80-110 E and 9 VAC 5-80-110 K)

3. At least one time per calendar week an observation of the presence of visible emissions from the six head sander material handling, load-out, and storage operations shall be made. The presence of visible emissions shall require the permittee to:
 - a. take timely corrective action such that the affected operation functions with no visible emissions, or,

- b. conduct a visible emission evaluation (VEE), in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the affected area are 10 percent opacity or less. If any of the observations exceed the opacity limitation of 10 percent, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the equipment resumes operation within the 10 percent opacity limit.
- c. If visible emission inspections conducted during four (4) consecutive weeks show no visible emissions the permittee may reduce the monitoring frequency to once per month for that emission unit. Anytime the monthly visible emissions inspections show visible emissions, or when requested by DEQ, the monitoring frequency shall be increased to once per week.

The permittee shall maintain an observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the name of the observer. If the six head sander material handling, loadout, and storage equipment has not been operated during the week, it shall be noted in the log book that the equipment was not operated and that a visual observation was not required. (9 VAC 5-80-110 E and 9 VAC 5-80-110 K)

C. Recordkeeping for the Six Head Sander (SA2)

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:
 - a. The annual throughput of Oriented Strandboard, in units of square feet per year, through the six head sander (SA2), calculated monthly as the sum of each consecutive 12 month period.
 - b. The origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations.
 - c. Results of weekly or monthly opacity observations of the six head sander (SA2), along with details regarding any necessary corrective actions.
 - d. Results of weekly or monthly opacity observations of the six head sander material handling, load-out, and storage operations along with details regarding any necessary corrective actions.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110 and Condition 10 of the 1/23/02 permit, as amended 1/22/04)

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X. Process Equipment Requirements – (emission unit IA ~ Brand Name Logo and Nail Mark Application System)

A. Limitations for Brand Name Logo and Nail Mark Application System (IA)

1. Emissions from the operation of the brand name logo and nail mark application system (IA) shall not exceed the limits specified below:

Volatile Organic Compounds	5.08 lb/hr	22.3 tons/yr
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(9 VAC 5-80-110, and Condition 4 of 5/9/02 permit, as amended 1/22/04)

2. Visible emissions from the brand name logo and nail mark application system shall not exceed 5 percent.
(9 VAC 5-80-110, 9 VAC 5-50-260, and Condition 5 of 5/9/02 permit, as amended 1/22/04)
3. See section XIII of this permit for additional limitations for the brand name logo and nail mark application system.
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

B. Monitoring for Brand Name Logo and Nail Mark Application System (IA)

See section XIII of this permit for monitoring requirements for the brand name logo and nail mark application system.

(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

C. Recordkeeping for Brand Name Logo and Nail Mark Application System (IA)

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:
 - a. A monthly and annual material balance of VOC (in tons) for the brand name logo and nail mark application system including inks and cleaners.
 - b. The origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110 and Condition 6 of the 5/9/02 permit, as amended 1/22/04)

2. See section XIII of this permit for additional recordkeeping requirements for the brand name logo and nail mark application system .
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

D. Reporting for Brand Name Logo and Nail Mark Application System (IA)

See section XIII of this permit for reporting requirements for the brand name logo and nail mark application system.
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

E. Testing for Brand Name Logo and Nail Mark Application System (IA)

See section XIII of this permit for testing requirements for the brand name logo and nail mark application system.
(9 VAC 5-80-110 and 40 CFR 63 Subpart DDDD)

XI. Process Equipment Requirements – (emission units T2(a-d) ~ Liquid Resin Storage Tanks)

A. Limitations for Liquid Resin Storage Tanks (T2a, T2b, T2c, and T2d)

1. The annual throughput of the phenol formaldehyde liquid resin shall not exceed 7.52×10^6 gallons per year, calculated monthly as the sum of each consecutive twelve (12) month period.
(9 VAC 5-80-110 and Condition 18 of November 10, 2004 Permit)
2. The annual throughput of the MDI liquid resin shall not exceed 4,965,000 gallons per year, calculated monthly as the sum of each consecutive twelve (12) month period.
(9 VAC 5-80-110 and Condition 19 of November 10, 2004 Permit)

B. Recordkeeping for Liquid Resin Storage Tanks (T2a, T2b, T2c, and T2d)

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:
 - a. The yearly throughput of phenol formaldehyde liquid resin, in units of gallons per year, calculated monthly as the sum of each consecutive twelve (12) month period.
 - b. The yearly throughput of MDI liquid resin, in units of gallons per year, calculated monthly as the sum of each consecutive twelve (12) month period.
 - c. The origin and value of all emission factors for all pollutants relied upon for purposes of calculating actual emission rates and the equations used in these calculations.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
(9 VAC 5-80-110 and Condition 39.e, and 39.f of November 10, 2004 Permit)

XII. Process Equipment Requirements – (emission units: (2) wax tanks, (1) thermal oil tank, and (1) hydraulic oil 68 tank)

A. Recordkeeping for Tanks (T1a, T1b, T3, and T4)

1. The permittee, per 40 CFR 60, Subpart Kb §60.116b (a), (b) and (d), shall keep readily accessible records showing the dimensions, and an analysis showing the capacity, of the two 25,500 gallon capacity storage tanks and shall report to the South Central Regional Office if the maximum true vapor pressure of the stored product exceeds 4 psi.
(9 VAC 5-80-110 and Condition 14 of November 10, 2004 Permit)

XIII. Plywood and Composite Wood Products (PCWP) MACT Requirements (40 CFR 63 Subpart DDDD)

A. PCWP MACT- General

This section of this permit is for the implementation of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Plywood and Composite Wood Products (PCWP), 40 CFR 63 Subpart DDDD, referred to as the PCWP MACT. Except where this permit is more restrictive, the permittee shall comply with the requirements of 40 CFR 63 Subpart DDDD.

1. Table 10 of 40 CFR 63 Subpart DDDD shows which parts of the General Provisions in 40 CFR 63.1 through 63.13 apply to the permittee.
(9 VAC 5-80-110 and 40 CFR 63.2290)
2. Terms used in section XIII of this permit are defined in the Clean Air Act (CAA), in 40 CFR 63.2, the General Provisions, and in 40 CFR 63.2292.
(9 VAC 5-80-110 and 40 CFR 63.2292)
3. The permittee must comply with the compliance options, operating requirements, and work practice requirements no later October 1, 2007.
(9 VAC 5-80-110 and 40 CFR 63.2233(b))

B. PCWP MACT Limitations

1. The permittee must use an emission control system and demonstrate that the resulting emissions meet the compliance options and operating requirements of in Tables 1B and 2 of 40 CFR 63 Subpart DDDD.
 - a. For the Energy System and Dryers the requirements of Table 1B are as follows:

- (1) reduce emissions of total HAP, measured as THC (as carbon, from which methane may be subtracted), by 90 percent; or
- (2) limit emissions of total HAP, measured as THC (as carbon, from which methane may be subtracted), to 20 ppmvd; or
- (3) reduce methanol emissions by 90 percent; or
- (4) limit methanol emissions to less than or equal to 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd; or
- (5) reduce formaldehyde emissions by 90 percent; or
- (6) limit formaldehyde emissions to less than or equal to 1 ppmvd if uncontrolled formaldehyde emissions entering the control device are greater than or equal to 10 ppmvd.

b. For the Energy System and Dryers the requirements of Table 2 are as follows:

The permittee must either maintain the 3-hour block average firebox temperature of each RTO above the minimum temperature established during the performance test or maintain the 3-hour block average THC concentration (from which methane may be subtracted) in the thermal oxidizer exhaust below the maximum concentration established during the performance test.

c. For the Press the requirements of Table 1B are as follows:

- (1) reduce emissions of total HAP, measured as THC (as carbon, from which methane may be subtracted), by 90 percent; or
- (2) limit emissions of total HAP, measured as THC (as carbon, from which methane may be subtracted), to 20 ppmvd; or
- (3) reduce methanol emissions by 90 percent; or
- (4) limit methanol emissions to less than or equal to 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd; or
- (5) reduce formaldehyde emissions by 90 percent; or
- (6) limit formaldehyde emissions to less than or equal to 1 ppmvd if uncontrolled formaldehyde emissions entering the control device are greater than or equal to 10 ppmvd.

d. For the Press the requirements of Table 2 are as follows:

The permittee must either maintain the 3-hour block average firebox temperature of each RTO above the minimum temperature established during the performance test or maintain the 3-hour block average THC concentration (from which methane may be subtracted) in the thermal oxidizer exhaust below the maximum concentration established during the performance test.

Furthermore, if the permittee chooses to comply with one of the concentration-based compliance options for the control system outlet (presented as option numbers 2, 4, or 6 in condition XIII.B.1.c) the permittee must have a capture

device that either meets the definition of wood products enclosure in 40 CFR 63.2292 or achieves a capture efficiency of greater than or equal to 95 percent.

(9 VAC 5-80-110 and 40 CFR 63.2240 (b))

2. The permittee must meet the work practice requirement in Tables 3 of 40 CFR 63 Subpart DDDD. For the group 1 miscellaneous coating operations, Table 3 requires that the permittee must use non-HAP coatings as defined in 40 CFR 63.2292.
(9 VAC 5-80-110 and 40 CFR 63.2241)

3. The permittee must be in compliance with the compliance options, operating requirements, and the work practice requirements in 40 CFR 63 Subpart DDDD at all times, except during periods of process unit or control device startup, shutdown, and malfunction; and prior to process unit initial startup. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during scheduled startup and shutdown periods, and during malfunctions. These startup and shutdown periods must not exceed the minimum amount of time necessary for these events.

The permittee must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions of 40 CFR 63.6 (e) (1) (i).

The permittee must develop and implement a written startup, shutdown, and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6 (e)(3).

(9 VAC 5-80-110 and 40 CFR 63.2250)

4. The permittee must demonstrate initial compliance with each compliance option, operating requirement, and work practice requirement that applies to the permitted facility according to Tables 5 and 6 of 40 CFR 63 Subpart DDDD and according to 40 CFR 63.2260 through 40 CFR 63.2269.
(9 VAC 5-80-110 and 40 CFR 63.2260 (b))
5. The permittee must conduct initial compliance demonstrations that do not require performance tests upon initial startup or no later than 30 calendar days after the compliance date that is specified for the permitted facility in condition XIII.A.3, whichever is later.
(9 VAC 5-80-110 and 40 CFR 63.2261 (b))

6. The permittee must demonstrate continuous compliance with the compliance options, operating requirements, and work practice requirements in 40 CFR 63.2240 and 63.2241 that apply to the permitted facility according to the methods specified in Tables 7 and 8 of 40 CFR 63 Subpart DDDD.
(9 VAC 5-80-110 and 40 CFR 63.2271 (a))

C. PCWP MACT Monitoring

1. The permittee must install, operate, and maintain each continuous parameter monitoring system (CPMS) according to paragraphs (a)(1) through (3) of 40 CFR 63.2269.
(9 VAC 5-80-110 and 40 CFR 63.2269 (a))
2. For each temperature monitoring device, the permittee must meet the requirements in condition XIII.C.1, and paragraphs (b)(1) through (6) of 40 CFR 63.2269.
(9 VAC 5-80-110 and 40 CFR 63.2269 (b))
3. The permittee must monitor and collect data according to 40 CFR 63.2270.
(9 VAC 5-80-110 and 40 CFR 63.2270)

D. PCWP MACT Testing

1. To demonstrate initial compliance with the compliance options and operating requirements, the permittee must conduct performance tests and establish each site-specific operating requirement in Table 2 of 40 CFR 63 Subpart DDDD according to the requirements in 40 CFR 63.2262 and Table 4 of 40 CFR 63 Subpart DDDD.
(9 VAC 5-80-110 and 40 CFR 63.2260 (a))
2. The permittee must conduct performance tests upon initial startup or no later than 180 calendar days after the compliance date that is specified for the permitted facility in condition XIII.A.3 and according to 40 CFR 63.7(a)(2), whichever is later.
(9 VAC 5-80-110 and 40 CFR 63.2261 (a))
3. The permittee must conduct each performance test according to the requirements in 40 CFR 63.7(e)(1), the requirements in paragraph (b) through (o) of 40 CFR 63.2262, and according to the methods specified in Table 4 of 40 CFR 63 Subpart DDDD.
(9 VAC 5-80-110 and 40 CFR 63.2262)

E. PCWP MACT Recordkeeping

1. The permittee must keep records the following records:
 - a. A copy of each notification and report that the permittee submitted to comply with 40 CFR 63 Subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
 - b. The records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
 - c. Records of performance test and performance evaluations as required in 40 CFR 63.10(b)(2)(viii)
(9 VAC 5-80-110 and 40 CFR 63.2282)
2. The permittee's records must be in a form suitable and readily available for expeditious review as specified in 40 CFR 63.10(b)(1).

As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

The permittee must keep records on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). The permittee can keep the records offsite for the remaining 3 years.

(9 VAC 5-80-110 and 40 CFR 63.2283)

F. PCWP MACT Reporting

1. The permittee must report each instance in which the permitted facility did not meet each compliance option, operating requirement, and work practice requirement in Table 8 of 40 CFR 63 Subpart DDDD that applies to the permitted facility. These instances are deviations from the work practice requirements in 40 CFR 63 Subpart DDDD. These deviations must be reported according to the requirements in condition XIII.F.3.

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(9 VAC 5-80-110 and 40 CFR 63.2271(b))

2. NOTIFICATIONS

- a. The permittee must submit all of the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9 (b) through (e), and (g) and (h) by the dates specified.
- b. The permittee must submit an Initial Notification no later than January 26, 2005 or after initial startup, whichever is later, as specified in 40 CFR 63.9(b)(2).
- c. If the permittee is required to conduct a performance test, the permittee must submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in 40 CFR 63.7(b)(1).
- d. If the permittee is required to conduct a performance test, design evaluation, or other initial compliance demonstration as specified in Tables 4, 5, and 6 of 40 CFR 63 Subpart DDDD, the permittee must submit a Notification of Compliance Status as specified in 40 CFR 63.9(h)(2)(ii).
 - (1) For each initial compliance demonstration required in Table 5 or 6 of 40 CFR 63 Subpart DDDD that does not include a performance test, the permittee must submit the Notification of Compliance Status before the close of business on the 30th calendar day following the completion of the initial compliance demonstration.
 - (2) For each initial compliance demonstration required in Tables 5 and 6 of 40 CFR 63 Subpart DDDD that includes a performance test conducted according to the requirements in Table 4 of 40 CFR 63 Subpart DDDD, the permittee

must submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test according to 40 CFR 63.10(d)(2).

- e. The permittee must notify the Administrator within 30 days before you take any of the actions specified in paragraphs (g)(1) through (3) of 40 CFR 63.2280.

(9 VAC 5-80-110 and 40 CFR 63.2280)

3. REPORTS

- a. The permittee must submit each report in Table 9 of 40 CFR 63 Subpart DDDD that applies to the permitted facility.
- b. Unless the Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), the permittee must submit each report by the date in Table 9 of 40 CFR 63 Subpart DDDD and as specified in paragraphs (b)(1) through (5) of 40 CFR 63.2281.
- c. The compliance report must contain the information in paragraphs (c)(1) through (8) of 40 CFR 63.2281.
- d. For each deviation from a compliance option or operating requirement and for each deviation from the work practice requirements in Table 8 of 40 CFR 63 Subpart DDDD that occurs at an affected source where the permittee is not using a CMS to comply with the compliance options, operating requirements, or work practice requirements in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (6) of 40 CFR 63.2281 and in paragraphs (d)(1) and (2) of 40 CFR 63.2281. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.
- e. For each deviation from a compliance option or operating requirement occurring at an affected source where the permittee is using a CMS to comply with the compliance options and operating requirements in this subpart, the permittee must include the information in paragraphs (c)(1) through (6) and paragraphs (e)(1) through (11) of 40 CFR 63.2281. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.
- f. Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 must report all deviations as defined in 40 CFR 63 Subpart DDDD in the semiannual monitoring report required by condition XIX.C.3. If an affected source submits a compliance report pursuant to Table 9 of 40 CFR 63 Subpart DDDD along with, or as part of, the semiannual monitoring report required by condition XIX.C.3, and the compliance report includes all required information concerning deviations from any compliance option, operating requirement, or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report.

(9 VAC 5-80-110 and 40 CFR 63.2281)

XIV. Facility Wide Conditions

A. Facility Wide Limitations

1. The annual production of finished Oriented Strandboard shall not exceed 522×10^6 square feet per year, calculated monthly as the sum of each consecutive 12 month period. Each rated square foot is based on a panel thickness of 3/8 inches.
(9 VAC 5-80-110 and Condition 20 of November 10, 2004 Permit)
2. Visible emissions from fugitive emission points shall not exceed ten percent (10%) opacity.
(9 VAC 5-80-110 and Condition 37 of November 10, 2004 Permit)
3. Unless otherwise specified in this permit, visible emissions shall not exceed 20 percent opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-80 and 9 VAC 5-80-110)

B. Facility Wide Recordkeeping

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the South Central Regional Office. These records shall include, but are not limited to:
 - a. The yearly production of finished Oriented Strandboard, in units of square feet per year, calculated monthly as the sum of each consecutive twelve (12) month period. The rated square footage shall be based on a panel thickness of 3/8 inches.
 - b. Annual hours of operation of the gasoline air compressor engine (Ref. No. 64), the gasoline pressure washer engine (Ref. No. 65), the diesel generator engine (Ref. No. 66), and the diesel fire pump engine (Ref. No. 67), each calculated monthly as the sum of each consecutive 12 month period.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110, 9 VAC 5-80-100 and Condition 39.g of November 10, 2004 Permit)

C. Facility Wide Testing

The permitted facility shall be constructed so as to allow for emissions testing and monitoring upon reasonable notice at any time, using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-80-110 and Condition 11 of November 10, 2004 Permit)

XV. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
1	Electrical A/C Heater Units	9 VAC 5 -80-720 A	---	---
2	One (1) 1.26 MMBtu/hr Gas Fired Boiler	9 VAC 5 -80-720 C	Natural Gas Combustion	1.26
3	Air Contaminant Detectors	9 VAC 5 -80-720 A	---	---
4	Air Dryers	9 VAC 5 -80-720 A	---	---
5	Bathroom Maintenance	9 VAC 5 -80-720 A	---	---
6	Batteries	9 VAC 5 -80-720 A	---	---
7	Battery Chargers	9 VAC 5 -80-720 A	---	---
8	Blow Down for Cleaning Purposes	9 VAC 5 -80-720 A	---	---
9	Blueprint Copier	9 VAC 5 -80-720 A	---	---
10	Copiers	9 VAC 5 -80-720 A	---	---
11	Crane Track Maintenance	9 VAC 5 -80-720 A	---	---
12	Defoamer	9 VAC 5 -80-720 A	---	---
13	Diesel Storage Tanks (for on-site vehicles and equipment)	9 VAC 5 -80-720 A	VOC	---
14	Dumpsters	9 VAC 5 -80-720 A	---	---
15	Edge Seal and Stencil Paint Totes	9 VAC 5 -80-720 A	VOC	---
16	Electric Welders	9 VAC 5 -80-720 A	---	---
17	Emergency Exit Lights with Battery	9 VAC 5 -80-720 A	---	---
18	Emergency Lights with Battery	9 VAC 5 -80-720 A	---	---
19	Exhaust Fans	9 VAC 5 -80-720 A	---	---
20	Exhaust Vents	9 VAC 5 -80-720 A	---	---
21	Forklifts - Propane Fired	9 VAC 5 -80-720 A	---	---
22	Gas and Diesel Fired Welders	9 VAC 5 -80-720 C	Natural Gas and Diesel Combustion	---
23	Gear Boxes	9 VAC 5 -80-720 A	---	---

24	Golf Carts	9 VAC 5 -80-720 A	---	---
25	Grinders	9 VAC 5 -80-720 A	PM	---
Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
26	Hydraulic Units	9 VAC 5 -80-720 A	---	---
27	Loaders	9 VAC 5 -80-720 A	---	---
28	Manlifts	9 VAC 5 -80-720 A	---	---
29	Natural Gas Space Heaters	9 VAC 5 -80-720 A	Natural Gas Combustion	---
30	Natural Gas Regulator Vents	9 VAC 5 -80-720 A	VOC	---
31	Paint Booths	9 VAC 5 -80-720 A	---	---
32	Paint Sprayers	9 VAC 5 -80-720 A	VOC	---
33	Parts Washer (water based)	9 VAC 5 -80-720 A	---	---
34	Pens	9 VAC 5 -80-720 A	---	---
35	Pneumatic Cylinders	9 VAC 5 -80-720 A	---	---
36	Pneumatic Hand Tools	9 VAC 5 -80-720 A	---	---
37	Pneumatic Valves	9 VAC 5 -80-720 A	---	---
38	Portable Heaters - Comfort Heaters	9 VAC 5 -80-720 A	---	---
39	Pressure Washers	9 VAC 5 -80-720 C	Gasoline Combustion	Less than 7 hp, each
40	Printers	9 VAC 5 -80-720 A	---	---
41	Propane Filling Systems	9 VAC 5 -80-720 A	VOC	---
42	Propane Natural Gas Mixing Regulators - Vented	9 VAC 5 -80-720 A	VOC	---
43	Propane Natural Gas Mixing Station	9 VAC 5 -80-720 A	VOC	---
44	Propane Regulators	9 VAC 5 -80-720 A	VOC	---
45	Radio Batteries	9 VAC 5 -80-720 A	---	---
46	Raw Water Treatment	9 VAC 5 -80-720 A	---	---
47	Release Agents Totes	9 VAC 5 -80-720 A	---	---
48	Road Flares - Cases	9 VAC 5 -80-720 A	---	---
49	Sand Blaster	9 VAC 5 -80-720 A	PM	---
50	Sewer Line Vents	9 VAC 5 -80-720 A	---	---
51	Shop Presses	9 VAC 5 -80-720 A	---	---
52	Solvent Storage Cabinets	9 VAC 5 -80-720 A	VOC	---
53	Steam Cleaners	9 VAC 5 -80-720 A	---	---
54	Test Ports	9 VAC 5 -80-720 A	---	---
55	Torches	9 VAC 5 -80-720 A	---	---
56	Tractor	9 VAC 5 -80-720 A	---	---
57	Vehicles	9 VAC 5 -80-720 A	---	---

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
58	Water Filtration Systems	9 VAC 5 -80-720 A	---	---
59	Water Tanks	9 VAC 5 -80-720 A	---	---
60	Wax Tanks	9 VAC 5 -80-720 A	---	300 gallons
61	WESP - Flush Tanks	9 VAC 5 -80-720 A	---	---
62	WESP - Recycling Tanks	9 VAC 5 -80-720 A	---	---
63	WESP Settling Ponds	9 VAC 5 -80-720 A	---	---
64	11 hp Gasoline Air Compressor Engine (See Note 1)	9 VAC 5 -80-720 B	Gasoline Combustion	11 hp
65	18 hp Gasoline Pressure Washer Engine (See Note 2)	9 VAC 5 -80-720 B	Gasoline Combustion	18
66	749 hp Diesel Generator Engine (See Note 3)	9 VAC 5 -80-720 B	Diesel Fuel Combustion	749 hp
67	208 hp Diesel Fire Pump Engine (See Note 4)	9 VAC 5 -80-720 B	Diesel Fuel Combustion	208 hp
68	Above ground Propane storage tank (pressure vessel)	9 VAC 5 -80-720 B	VOC	30,000 gallons
69	Above ground used-oil storage tank	9 VAC 5 -80-720 B	VOC	2,200 gallons

Note 1 - The 11 hp gasoline air compressor engine (Ref. No. 64) shall not operate more than 2,000 hours per year, calculated monthly as the sum of each consecutive 12 month period. (9 VAC 5-80-100)

Note 2 - The 18 hp gasoline pressure washer engine (Ref. No. 65) shall not operate more than 1,200 hours per year, calculated monthly as the sum of each consecutive 12 month period. (9 VAC 5-80-100)

Note 3 - The 749 hp diesel generator engine (Ref. No. 66) shall not operate more than 400 hours per year, calculated monthly as the sum of each consecutive 12 month period. (9 VAC 5-80-100)

Note 4 - The 208 hp diesel fire pump engine (Ref. No. 67) shall not operate more than 1,500 hours per year, calculated monthly as the sum of each consecutive 12 month period. (9 VAC 5-80-100)

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping (except as specified in Notes 1 through 4 above and Section XIV.B.1.b.),

or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

XVI. Compliance Assurance Monitoring Implementation Plan

A. Description of Compliance Assurance Monitoring (CAM) Requirements

The Energy System and Dryers (ES&D) are a Large Pollutant-Specific Emissions Unit (PSEU), as defined in 40 CFR 64 (Compliance Assurance Monitoring (CAM)), for Carbon Monoxide (CO), and installation and operation of a Parameter Monitoring System (PMS) is required by condition III.B.4 of this permit. In accordance with 40 CFR 64.4 (e), if the monitoring submitted by the permittee requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of 40 CFR 64, the permittee shall include an implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring. The implementation plan and schedule shall provide for use of the monitoring as expeditiously as practicable but in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit. The permittee is subject to the schedule described below. The schedule includes an enforceable sequence of actions with milestones, leading to compliance with CAM requirements.

(9 VAC 5-80-110 and 40 CFR 64)

B. CAM Implementation Schedule

1. By 5 days after the Significant Modification date as shown on page 1 of this permit, the permittee shall provide to the South Central Regional Office confirmation of the date by which contract for PMS is awarded.
2. By 100 days after the Significant Modification date as shown on page 1 of this permit, the permittee shall begin on-site construction or installation of the PMS.
3. By 107 days after the Significant Modification date as shown on page 1 of this permit, the permittee shall have completed on-site construction or installation of the PMS.
4. By 160 days after the Significant Modification date as shown on page 1 of this permit, the permittee shall submit a CAM Plan which is approvable in accordance with 40 CFR 64.

(9 VAC 5-80-110 and 40 CFR 64.4 (e))

C. CAM Implementation Plan Reporting Requirements

Within 14 days after the dates provided in **CAM Implementation Plan Schedule** above, the permittee shall provide written confirmation to the Director, South Central Region that the milestone has been achieved. If the milestone is not achieved by the date required in the compliance schedule, the source shall, within 14 days after the date,

provide a written explanation of the reason the compliance date was not met, and a proposed alternate date.
(9 VAC 5-80-110 and 40 CFR 64)

XVII. Supplemental Environmental Project

The permittee shall comply with the provisions of the Consent Order, including the Supplemental Environmental Project, signed on 9/17/04 between the Virginia Department of Environmental Quality and Huber Engineered Woods, LLC. A copy of this Consent Order is attached to this permit.

XVIII. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
No inapplicable requirements were identified		

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

XIX. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements.
 - b. The date(s) analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses.
 - f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip -chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
(9 VAC 5-80-110 F)
3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
 - a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
 - b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:
 - (1) Exceedance of emissions limitations or operational restrictions;
 - (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
 - (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
 - c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi -annual reporting period."

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.

2. The identification of each term or condition of the permit that is the basis of the certification.
3. The compliance status.
4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incidence of non-compliance.
5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
6. Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, South Central Region within four daytime business hours, after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition XIX.C.3 of this permit.
(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, South Central Region by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the

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estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, South Central Region.
(9 VAC 5-20-180 C)

1. Each owner required to install a continuous monitoring system subject to 9 VAC 5-40-41 or 9 VAC 5-50-41 shall submit a written report of excess emissions (as defined in the applicable emission standard) to the board for every semi-annual period. All semi-annual reports shall be postmarked by the 30th day following the end of each semi-annual period and shall include the following information:
 - a. The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h) or 9 VAC 5-40-41 B 6, any conversion factors used, and the date and time of commencement and completion of each period of excess emissions;
 - b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the source. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted;
 - c. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments; and
 - d. When no excess emissions have occurred or the continuous monitoring systems have not been inoperative, repaired or adjusted, such information shall be stated in the report.
2. All malfunctions of emission units not subject to 9 VAC 5-40-50 C and 9 VAC 5-50-50 C require written reports within 14 days of the discovery of the malfunction.

(9 VAC 5-20-180 C and 9 VAC 5-50-50)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit

termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.

(9 VAC 5-80-190 and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.

(9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.

(9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.

(9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.

(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described

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in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1. (9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-160)
2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)
3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.
2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
 - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - b. The permitted facility was at the time being properly operated.
 - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
 - d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the

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malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.

3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.
4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any of the grounds for revocation or termination or for any other violations of these regulations.

(9 VAC 5-80-190 C and 9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.

(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.

(40 CFR Part 82, Subparts A -F)

Y. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

Z. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110 I)

AA. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection n N, shall be included to determine compliance.
2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)